

Exhibit A

Milbank

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Partner

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February 4, 2025

VIA EMAIL

In re JOANN Inc., *et al.* (Case No. 25-10068)

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

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-and-

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500 Delaware Avenue, Suite 1410

Wilmington, DE 19801

Proposed Co-Counsel for the Debtors

Re: Reclamation Demand by SVP Sewing Brands LLC

Counsel:

As you may know, Milbank LLP represents SVP Sewing Brands LLC (“SVP”) in the chapter 11 cases jointly administered before the U.S. Bankruptcy Court for the District of Delaware under the caption *In re JOANN Inc.*, Case No. 25-10068.

MILBANK LLP

NEW YORK | LOS ANGELES | WASHINGTON, D.C. | SÃO PAULO | FRANKFURT
LONDON | MUNICH | BEIJING | HONG KONG | SEOUL | SINGAPORE | TOKYO

February 4, 2025

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Pursuant to SVP's rights under the Uniform Commercial Code, as codified by applicable state law, and Section 546(c) of the U.S. Bankruptcy Code, SVP hereby makes demand for reclamation of certain goods which Jo-Ann Stores, LLC and/or its affiliates (collectively with Jo-Ann Stores, LLC, "Jo-Ann") received from SVP, in the ordinary course of SVP's business, while Jo-Ann was insolvent, on or after December 1, 2024, and before the petition date of January 15, 2025 (the "SVP Goods"), including, without limitation, the goods described in the attached supporting documentation.¹ SVP believes that the total value of the SVP Goods is no less than \$198,721.80. Please immediately segregate all SVP Goods from all other goods in the possession of Jo-Ann and deliver an itemization of the SVP Goods so segregated (including the quantity and alleged value).

The purpose of this letter is to perfect and preserve SVP's rights under Section 546(c) of the Bankruptcy Code, the Uniform Commercial Code, and other applicable law. SVP reserves the right to amend or otherwise supplement this demand, and additionally reserves all rights, remedies, claims, or interests it may have with respect to the SVP Goods or any other matters relating to its relationship with Jo-Ann or otherwise.

If you have any questions, please contact me directly.

Yours sincerely,

/s/ Dennis F. Dunne
Dennis F. Dunne

¹ SVP reserves the right to supplement or otherwise modify the supporting documentation.

Supporting Documentation

SVP Sewing Brands, LLC**INVOICE**

Date 12/18/24	Account No. 124009	Order No. 4503685 - SZ	Invoice No. 4549110RI	Page 1
-------------------------	------------------------------	----------------------------------	---------------------------------	------------------

Your reference COL	05178368
Your order No. 0176022961	Terms of payment NET 75 DAYS

Mode of transport Blank - Route Code 42/RT	Due Date 03/03/25
Bill to JO-ANN STORES INC ATTN: ACCOUNTS PAYABLE VENDOR # 175676 5555 DARROW RD HUDSON OH 44236	Ship to JO-ANN STORES INC DC04 VISALIA CA DISTRIBUTION CENTER 2500 N PLAZA DR VISALIA CA 93291-9308

Invoices not paid within terms will be charged 1.5% per month (18% per annum).

Item number	Product description	Order	Ship	B/O	Unit price	Total
	Order No. 4503685 - SZ					
230023112	7285Q PATCHWORK US/CA	351	351		175.0000	61,425.00
A:EXEMPT:104814775						
TOTAL AMOUNT					USD	61,425.00

Remit To: SVP Sewing Brands, LLC

PO Box 844840
Dallas, TX 75284-4840

Phone 800-543-2825
Fax 615-213-0894

Any disputes on an invoice must be submitted within 60 days of the date invoice.

Inquiries:

SVP Sewing Brands, LLC 300 2nd Ave S. Suite 200 Nashville, TN 37201

Any dispute not raised SVP shall be entitled to full payment, without dispute.

SVP Sewing Brands, LLC**INVOICE**

Date 12/18/24 Account No. 124009 Order No. 4511545 - SZ Invoice No. 4549111RI Page 1

Your reference
COL

Your order No.

0176799984

05521526

Terms of payment
NET 75 DAYS

Mode of transport

Blank - Route Code 42/RT

Bill to

JO-ANN STORES INC
ATTN: ACCOUNTS PAYABLE
VENDOR # 175676
5555 DARROW RD
HUDSON OH 44236

Due Date

03/03/25

Ship to

JO-ANN STORES INC DC06
OPELIKA AL DISTRIBUTION CENTER
2400 JOANN DR
OPELIKA AL 36801-9745

Invoices not paid within terms will be charged 1.5% per month (18% per annum).

Item number	Product description	Order	Ship	B/O	Unit price	Total
	Order No. 4511545 - SZ					
230023112	7285Q PATCHWORK US/CA	16	16		175.0000	2,800.00
250029647.03	SINGER SEW EASY FOOT BLST PAC	6	6		7.2000	43.20
250059996.06	FOOT DARN/EMB PLASTIC	12	12		9.0000	108.00
250061696.06	INVIS ZIPPER FT BLST PK US/LTM	24	24		7.2000	172.80
250051396.10	HD COMPUTERIZED EXT TABLE	10	10		30.0000	300.00
230311112	SE9180 SEW & EMB US/CA	4	4		543.9900	2,175.96
	Serial# 0356200094					
	Serial# 035677010082					
	Serial# 56190746					
	Serial# 56190882					

A:EXEMPT:104814775

TOTAL AMOUNT USD 5,599.96

Remit To: SVP Sewing Brands, LLC

PO Box 844840

Dallas, TX 75284-4840

Phone

800-543-2825

Fax

615-213-0894

Inquiries:

SVP Sewing Brands, LLC 300 2nd Ave S. Suite 200 Nashville, TN 37201

Any disputes on an invoice must be submitted within 60 days of the date invoice.

Any dispute not raised SVP shall be entitled to full payment, without dispute.

SVP Sewing Brands, LLC**INVOICE**

Date 12/20/24 Account No. 124009 Order No. 4510833 - SZ Invoice No. 4549864RI Page 1

Your reference
COL

05511436

Your order No.

Terms of payment
NET 75 DAYS

0176929567

Mode of transport

Blank - Route Code 42/RT

Due Date

03/05/25

Bill to

JO-ANN STORES INC
ATTN: ACCOUNTS PAYABLE
VENDOR # 175676
5555 DARROW RD
HUDSON OH 44236

Ship to

JO-ANN STORES INC DC01
5350 HUDSON INDUSTRIAL PKWY
HUDSON OH DISTRIBUTION CENTER
NOTIONS/CRAFTS DOCK
HUDSON OH 44236

Invoices not paid within terms will be charged 1.5% per month (18% per annum).

Item number	Product description	Order	Ship	B/O	Unit price	Total
	Order No. 4510833 - SZ					
230023112	7285Q PATCHWORK US/CA	300	300		175.0000	52,500.00
230413112	14HD-854 US/CA	50	50		208.9300	10,446.50
230256112	HD6800C SINGER US/CA	50	50		241.8200	12,091.00
230061112	6180 BRILLIANCE US/CA	250	250		115.5000	28,875.00
230311112	SE9180 SEW & EMB US/CA	7	7		543.9900	3,807.93
	Serial# 035626010179					
	Serial# 035627010078					
	Serial# 56190481					
	Serial# 56190658					
	Serial# 56190659					
	Serial# 56190739					
	Serial# 56190880					

A:EXEMPT:104814775

TOTAL AMOUNT USD 107,720.43

Remit To: SVP Sewing Brands, LLC

PO Box 844840

Phone

Fax

Dallas, TX 75284-4840

800-543-2825

615-213-0894

Inquiries:

SVP Sewing Brands, LLC 300 2nd Ave S. Suite 200 Nashville, TN 37201

Any disputes on an invoice must be submitted within 60 days of the date invoice.

Any dispute not raised SVP shall be entitled to full payment, without dispute.

SVP Sewing Brands, LLC**INVOICE**

Date 12/20/24 Account No. 124009 Order No. 4511543 - SZ Invoice No. 4549865RI Page 1

Your reference
COL

05511071

Your order No.

Terms of payment
NET 75 DAYS

0176799982

Mode of transport

Blank - Route Code 42/RT

Due Date

03/05/25

Bill to

JO-ANN STORES INC
ATTN: ACCOUNTS PAYABLE
VENDOR # 175676
5555 DARROW RD
HUDSON OH 44236

Ship to

JO-ANN STORES INC DC01
5350 HUDSON INDUSTRIAL PKWY
HUDSON OH DISTRIBUTION CENTER
NOTIONS/CRAFTS DOCK
HUDSON OH 44236

Invoices not paid within terms will be charged 1.5% per month (18% per annum).

Item number	Product description	Order	Ship	B/O	Unit price	Total
	Order No. 4511543 - SZ					
250029647.03	SINGER SEW EASY FOOT BLST PAC	12	12		7.2000	86.40
413182545	GREEN PLASTIC BOBBINS 10-PK	1	1		5.0200	5.02
250059996.06	FOOT DARN/EMB PLASTIC	18	18		9.0000	162.00
250061696.06	INVIS ZIPPER FT BLST PK US/LTM	12	12		7.2000	86.40
250051396.10	HD COMPUTERIZED EXT TABLE	10	10		30.0000	300.00
230311112	SE9180 SEW & EMB US/CA	1	1		543.9900	543.99
	Serial# 56190888					

A:EXEMPT:104814775

TOTAL AMOUNT

USD

1,183.81

Remit To: SVP Sewing Brands, LLC

PO Box 844840

Phone

Fax

Dallas, TX 75284-4840

800-543-2825

615-213-0894

Inquiries:

SVP Sewing Brands, LLC 300 2nd Ave S. Suite 200 Nashville, TN 37201

Any disputes on an invoice must be submitted within 60 days of the date invoice.

Any dispute not raised SVP shall be entitled to full payment, without dispute.

Date: 12/18/2024

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BILL OF LADING

Page 1 of 2

SHIP FROM

Name: SVP Sewing Brands, LLC
Address: 578 Aldi Blvd
City/ST/Zip: Mt Juliet, TN 37122
TMS#:

FOB: ☐

Bill of Lading Number: 7173784



CARRIER NAME: XPO LOGISTICS

Trailer number:

Seal number(s):

SHIP TO

Name: JO-ANN STORES INC DC04
Address: VISALIA CA DISTRIBUTION CENTER
Address: 2500 N PLAZA DR
City/ST/Zip: VISALIA, CA 93291-9308

Do Not Deliver Before Date:

Delivery Requested Date: 11/07/2024

FOB: ☐

SCAC: XPOL

Pro Number:



XPO

179-848056

Driver's signature acknowledges receipt of freight only. Received shipment is subject to terms of a written contract, if any, otherwise subject to the terms, conditions and limitations of liability set forth in XPO Freight, Inc. rules tariff. (see www.xpo.com)

Freight Charge Terms: (freight charges are prepaid unless marked otherwise)

Prepaid ☐ Collect ☒ 3rd Party ☐☐
(check box)Master Bill of Lading: with attached
underlying Bills of Lading

Order ID:205178368-1

CID #: 4503685

SPECIAL INSTRUCTIONS:

CUSTOMER ORDER INFORMATION

PO NUMBER	# PKGS	WEIGHT	CUBE	PALLET/SLIP (CIRCLE ONE)	ADDITIONAL SHIPPER INFO (PALLET TYPE) (COUNT)
0176022961	351	0.00	742.01	Y N	
GRAND TOTAL	351	0.00	742.01		

CARRIER INFORMATION

HANDLING UNIT		PACKAGE		WEIGHT	H.M. (X)	COMMODITY DESCRIPTION <small>Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC Item 360</small>	LTL ONLY	
QTY	TYPE	QTY	TYPE				NMFC #	CLASS
		351	CTNS	7,739.55		see addendum page for item details		
Total Pallet weight								
17	PLTS	351	CTNS			GRAND TOTAL		

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

"The agreed or declared value of the property is specifically stated by the shipper to be not exceeding

_____ per _____."

COD Amount: \$ _____

Fee Terms: Collect: ☐ Prepaid: ☐Customer check acceptable: ☐

NOTE: Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. 14706(c)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Geodis Logistics, LLC

Agent for Shipper

SHIPPER SIGNATURE/DATE

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

Trailer Loaded: Freight Counted:

☒ By Shipper☐ By Shipper☐ By Driver☐ By Driver/pallets☐ By Driver/Pieces

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

Signature



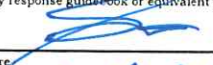
Date

Number of Pieces

Date: 12/18/2024

BILL OF LADING

Page 1 of 2

SHIP FROM				Bill of Lading Number: 7173784			
Name: SVP Sewing Brands, LLC Address: 578 Aldi Blvd City/ST/Zip: Mt Juliet, TN 37122 TMS#:							
FOB: <input type="checkbox"/>				CARRIER NAME: XPO LOGISTICS Trailer number: Seal number(s):			
SHIP TO				SCAC: XPOL P 			
Name: JO-ANN STORES INC DC06 Address: OPELIKA AL DISTRIBUTION CENTER Address: 2400 JOANN DR City/ST/Zip: OPELIKA, AL 36801-9745				XPO <small>Driver's signature acknowledges receipt of freight only. Received shipment is subject to terms of a written contract, if any, otherwise subject to the terms, conditions and limitations of liability set forth in XPO Freight, Inc. rules tariff. (see www.xpo.com)</small>			
Do Not Deliver Before Date: Delivery Requested Date: 12/05/2024				FOB: <input type="checkbox"/>			
SEND FREIGHT BILL TO:				Freight Charge Terms: (freight charges are prepaid unless marked otherwise) Prepaid <input type="checkbox"/> Collect <input checked="" type="checkbox"/> 3rd Party <input type="checkbox"/>			
				<input type="checkbox"/> (check box) Master Bill of Lading: with attached underlying Bills of Lading			
Order ID: 205521526-1 CID #: 4511545 SPECIAL INSTRUCTIONS:							
CUSTOMER ORDER INFORMATION							
PO NUMBER		# PKGS	WEIGHT	CUBE	PALLET/SLIP (CIRCLE ONE)	ADDITIONAL SHIPPER INFO (PALLET TYPE) (COUNT)	
0176799984		72	0.00	47.74	Y N		
GRAND TOTAL		72	0.00	47.74			
CARRIER INFORMATION							
HANDLING UNIT		PACKAGE		WEIGHT	H.M. (X)	COMMODITY DESCRIPTION <small>Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation with ordinary care. See Section 2(e) of NMFC Item 360</small>	
QTY	TYPE	QTY	TYPE				
		72	CTNS	482.16		LTL ONLY NMFC # CLASS	
Total Pallet weight							
2	PLTS	72	CTNS				
GRAND TOTAL							
Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows: The agreed or declared value of the property is specifically stated by the shipper to be not exceeding _____ per _____						COD Amount: \$ _____ Fee Terms: Collect: <input type="checkbox"/> Prepaid: <input type="checkbox"/> Customer check acceptable: <input type="checkbox"/>	
NOTE: Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. 14706(c)(1)(A) and (B).							
RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.						The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. Geodis Logistics, LLC Agent for Shipper	
SHIPPER SIGNATURE/DATE This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.				Trailer Loaded: Freight Counted: <input checked="" type="checkbox"/> By Shipper <input type="checkbox"/> By Shipper <input type="checkbox"/> By Driver <input type="checkbox"/> By Driver/pallets said to contain <input type="checkbox"/> By Driver/Pieces		CARRIER SIGNATURE / PICKUP DATE Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and/or carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle. Signature:  Date: 12-18-24 Number of Pieces: _____	

Date: 12/20/2024

BILL OF LADING

Page 1 of 2

SHIP FROM

Name: SVP Sewing Brands, LLC
Address: 578 Aldi Blvd

City/ST/Zip: Mt Juliet, TN 37122

TMS#:

FOB: ☐

Bill of Lading Number: 7175875



CARRIER NAME: Coyote logistics

Trailer number: 153096

Seal number(s): ~~45341597~~ 45341584

SCAC: CLLQ

Pro Number: 184275725



Name: JO-ANN STORES INC DC01
Address: 5350 HUDSON INDUSTRIAL PKWY
Address: HUDSON OH DISTRIBUTION CENTER
City/ST/Zip: HUDSON, OH 44236

Do Not Deliver Before Date: 12/20/2024

Delivery Requested Date: 12/05/2024

FOB: ☐

SEND FREIGHT BILL TO:

Freight Charge Terms: (freight charges are prepaid unless marked otherwise)

Prepaid ☐ Collect ☒ 3rd Party ☐
☐
(check box)

Master Bill of Lading; with attached underlying Bills of Lading

Order ID: 205511436- 205511071-

CID #: 4511543 4510833

SPECIAL INSTRUCTIONS:

CUSTOMER ORDER INFORMATION

PO NUMBER	# PKGS	WEIGHT	CUBE	PALLET/SLIP (CIRCLE ONE)	ADDITIONAL SHIPPER INFO (PALLET TYPE) (COUNT)
0176799982	54	47.07	3.63	Y N	STANDARD 1
0176929567	657	12,746.36	1,164.60	Y N	STANDARD 26
GRAND TOTAL	711	12,793.43	1,168.23		27

CARRIER INFORMATION

HANDLING UNIT		PACKAGE		WEIGHT	H.M. (X)	COMMODITY DESCRIPTION <small>Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to insure safe transportation with ordinary care. See Section 2(a) of NMFC Item 360</small>	L/TL ONLY	
QTY	TYPE	QTY	TYPE				NMFC #	CLASS
		711	CTNS	12,793.43		see addendum page for item details		
	Total Pallet weight			1,215.00				
27	PLTS	711	CTNS	14,008.43		GRAND TOTAL		

Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property as follows:

The agreed or declared value of the property is specifically stated by the shipper to be not exceeding

_____ per _____

COD Amount: \$ _____

Fee Terms: Collect: ☐ Prepaid: ☐Customer check acceptable: ☐

NOTE: Liability Limitation for loss or damage in this shipment may be applicable. See 49 U.S.C. 14706(e)(1)(A) and (B).

RECEIVED, subject to individually determined rates or contracts that have been agreed upon in writing between the carrier and shipper, if applicable, otherwise to the rates, classifications and rules that have been established by the carrier and are available to the shipper, on request, and to all applicable state and federal regulations.

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Geodis Logistics, LLC

Agent for Shipper

CARRIER SIGNATURE / PICKUP DATE

Carrier acknowledges receipt of packages and required placards. Carrier certifies emergency response information was made available and for carrier has the DOT emergency response guidebook or equivalent documentation in the vehicle.

 Date: 12-20-24
 Number of Pieces: _____

SHIPPER SIGNATURE/DATE

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the DOT.

Trailer Loaded: Freight Counted:

☒ By Shipper☐ By Shipper☐ By Driver☐ By Driver/pallets☐ By Driver/Pieces